

ORD 1025
10-15-12
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From: Bath, Bill
To: Goins, Doug; Matsushita, Gene S; Owens, Brad W; Gilliam, Jessica;
Hendershot, Philip; Smith, Michael J.;
Subject: RE: EPA position on RCRA landfill
Date: Friday, June 15, 2012 11:13:42 AM
Attachments: KO88 waste.PNG

I could not find analytical sample results for K088 at the RCRA landfill. I feel certain that this was sampled back in the 1980s, but I didn't find anything in my quick review.

Sampling results from the CERCLA landfill as presented in the late 1980s RIFS and ROD are attached. The CERCLA landfill had a bunch of waste other than K088, so these results could be biased low relative to the "undiluted" RCRA landfill waste. Free cyanide exceeds the LDR criterion of 30mg/Kg in some samples. The LDRs for PAHs are expressed as individual chemicals, whereas the attached results display "total PAHs," so we cannot determine whether this would meet LDRs.

When we tested the K088 waste at the landfillettes back in 2007 or 2008, it met all LDR criteria.

Since historical data could not be used to make a demonstration regarding LDR compliance today, I don't recommend delving into the archives. Depending on test results, the RCRA landfill waste may or may not meet LDR standards.

From: Goins, Doug
Sent: Thursday, June 14, 2012 9:09 PM
To: Bath, Bill; Matsushita, Gene S; Owens, Brad W; Gilliam, Jessica; Phillip Hendershot; Mike Smith
Subject: RE: EPA position on RCRA landfill

EPA states:

"An operating permit for ongoing treatment of K088 waste is therefore required, or the unit must be closed in accordance with all standards that are applicable at the time treatment ceases". If this site was closed prior to Land Disposal Restrictions but now may have to be closed consistent with the current rules doesn't it create an LDR problem? I think that is what EPA was getting at. Not a good

development. Bill, what do you think?

Doug

From: Bath, Bill

Sent: Tuesday, June 12, 2012 5:20 PM

To: Matsushita, Gene S; Goins, Doug; Owens, Brad W; Gilliam, Jessica; Phillip Hendershot; Mike Smith

Subject: EPA position on RCRA landfill

After requesting and receiving a number of background documents on the RCRA landfill, EPA has formalized its position that it must be re-permitted as a treatment unit (or additional treatment specifications must be added to the permit). See attached.

EPA's letter makes a reference to the RCRA landfill being closed prior to the effective date of the Land Disposal Restrictions, which would seem to be immaterial to EPA's position. Let's ask EPA for clarification on why this is a material fact.

From: MOORE Fredrick [<mailto:MOORE.Fredrick@deq.state.or.us>]

Sent: Tuesday, June 12, 2012 1:44 PM

To: Bath, Bill; Cole, Connie

Subject: EXTERNAL: FW: Review of Revised Draft Post-Closure Permit, Lockheed Martin

Hi Bill and Connie, treatment letter from EPA. See what you think, Fredrick

From: MOORE Fredrick

Sent: Tuesday, June 12, 2012 12:36 PM

To: DRUBACK Lissa

Subject: FW: Review of Revised Draft Post-Closure Permit, Lockheed Martin

Hi Lissa, haven't read it, yet. Cheers, Fredrick

From: Christy Brown [<mailto:Brown.Christy@epamail.epa.gov>]

Sent: Tuesday, June 12, 2012 12:06 PM

To: MOORE Fredrick

Subject: Fw: Review of Revised Draft Post-Closure Permit, Lockheed Martin

Hi Fredrick. Attached please find the letter regarding treatment under RCRA, as requested.

Thanks! - christy

Christy Ahlstrom Brown
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----- Forwarded by Christy Brown/R10/USEPA/US on 06/12/2012 12:04 PM -----

From: Robin Weiss/R10/USEPA/US

To: ~~Christy Brown/R10/USEPA/US@EPA,~~

Cc:

Date: 06/12/2012 11:27 AM

Subject: Review of Revised Draft Post-Closure Permit, Lockheed Martin

Here is the PDF of the letter.

(See attached file: Review of Revised Draft Post-Closure Permit.pdf)

Robin Weiss
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Seattle, WA. 98101

phone 206.553.8577

From: Bath, Bill
To: Gilliam, Jessica; Smith, Michael J.; Hendershot, Philip;
Subject: does gas venting at a closed landfill make it a "treatment unit"
Date: Wednesday, June 06, 2012 3:05:21 PM

I did some searches to see if I could find examples of blowing gas through closed RCRA landfills to minimize leachate generation, and didn't find any examples. However, I was intrigued to see that flaring off methane is a common practice at municipal landfills- see attached excerpt.

This situation differs from RCRA landfill at The Dalles in that 1) it's municipal solid waste regulated under Subtitle D of RCRA, not a Subtitle C hazardous waste landfill and 2) the landfills are venting a nuisance gas, not forcing gas through to minimize leachate generation. But I'm very interested that instead of calling these landfills "treatment units" (and note the picture of the huge flare, clearly intended to treat), they are still called closed landfills. I imagine that some of these flares were added after the original closure decision and regulatory approval, yet no one said "you need to go back to square one and re-consider the closure now that the landfill was converted to a treatment unit."

Having said that, I would like to find some examples of direct actions to minimize leachate and/or gas generation from closed Subtitle C landfills. The *case example* approach may be easier than finding an EPA guidance on this obscure topic.